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Docket No.: 52-025

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10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.3.07.05.iii [Index Number 398]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 14, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.3.07.05.iii [Index Number 398] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.07.05.iii [Index Number 398]. Southern Nuclear Operating Company will at a later date provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

This notification is informed by the guidance described in NEI-08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52*, which was endorsed by the NRC in Regulatory Guide 1.215. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact David Woods at 706-848-6903.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox".

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

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Completion Plan for Uncompleted ITAAC 2.3.07.05.iii [Index Number 398]

MJY/kms/amm

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**Southern Nuclear Operating Company
ND-16-2139
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.3.07.05.iii [Index Number 398]**

Subject: Uncompleted ITAAC 2.3.07.05.iii [Index No. 398]

ITAAC Statement

Design Commitment

5. *The seismic Category I components identified in Table 2.3.7-1 can withstand seismic design basis loads without loss of safety functions.*

Inspections/Tests/Analyses

- iii) *Inspection will be performed for the existence of a report verifying that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.*

Acceptance Criteria

- iii) *A report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.*

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the seismic Category I components (equipment) identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.7-1 (Attachment A) can withstand seismic design basis loads without loss of safety function. The subject ITAAC requires that an inspection is performed for the existence of a report verifying that the as-built equipment including anchorage are seismically bounded by the tested or analyzed conditions.

Seismic qualification of the equipment in VEGP Unit 3 COL Appendix C Table 2.3.7-1 is verified by type tests, analyses, or a combination of type tests and analyses in accordance with ITAAC 2.3.07.05.ii (Reference 1). As part of the seismic qualification program, consideration is given to the definition of clearances needed around the equipment mounted in the plant to permit the equipment to move during a postulated seismic event without causing impact between adjacent pieces of safety-related equipment or between safety-related equipment and adjacent non-safety related structures or components. This is done as part of seismic testing by measuring the maximum dynamic relative displacement of the top and bottom of the equipment. Justification is provided that the equipment will not impact adjacent equipment or structures as part of the Equipment Qualification (EQ) As-Built Reconciliation Report (Reference 2) based on the walkdown inspection.

The qualification reports of the equipment identify the equipment mounting employed for qualification and establish interface requirements for assuring that subsequent in-plant

installation does not degrade the established qualification. Interface requirements are defined based on the test configuration and other design requirements.

In accordance with EQ Walkdown Inspection Procedure XYZ (Reference 3), an inspection is conducted of the Spent Fuel Pool Cooling System (SFS) to confirm the satisfactory installation of the seismically qualified equipment. The inspection includes verification of equipment make/model/serial number; verification of as-built equipment mounting orientation, anchorage and clearances; and verification of electrical and other interfaces.

The documentation of installed configuration of seismically qualified equipment includes photographs and/or sketches of equipment/mounting/interfaces. The verification of installed equipment configuration is documented in the EQ As-Built Reconciliation Report(s).

Attachment A identifies the EQ As-Built Reconciliation Report(s) which verify that the installed configuration of the Seismic Category I components (equipment) identified in VEGP Unit 3 COL Appendix C Table 2.3.7-1, including anchorage, is seismically bounded by the tested or analyzed conditions and IEEE Standard 344-1987 (Reference 4) and NRC Regulatory Guide 1.100, Rev. 2 (Reference 5). The EQ As-Built Reconciliation Report(s) are available for NRC inspection as part of the ITAAC Completion Package (Reference 6).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.07.05.ii [Index No. 397]
2. EQ As-Built Reconciliation Report(s) as identified in Attachment A
3. EQ Walkdown Inspection Procedure XYZ
4. IEEE Standard 344-1987, "Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations"
5. Regulatory Guide 1.100, Rev. 2, "Seismic Qualification of Electric and Mechanical Equipment for Nuclear Power Plants"
6. ITAAC 2.3.07.05.iii Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.3.7-1

**ITAAC COMPLIANCE MATRIX FOR SEISMIC CATEGORY I COMPONENTS (EQUIPMENT)
(SPENT FUEL POOL COOLING SYSTEM)**

| Component Name | Tag No. | Seismic Cat. I | EQ As-Built Reconciliation Report(s) |
|-------------------------------------------------------------|----------------|-----------------------|---------------------------------------------|
| Spent Fuel Pool Level Sensor | SFS-019A | Yes | XXX |
| Spent Fuel Pool Level Sensor | SFS-019B | Yes | XXX |
| Spent Fuel Pool Level Sensor | SFS-019C | Yes | XXX |
| Refueling Cavity Drain to SGS Compartment Isolation Valve | SFS-PL-V031 | Yes | XXX |
| Refueling Cavity to SFS Pump Suction Isolation Valve | SFS-PL-V032 | Yes | XXX |
| Refueling Cavity Drain to Containment Sump Isolation Valve | SFS-PL-V033 | Yes | XXX |
| IRWST to SFS Pump Suction Line Isolation Valve | SFS-PL-V039 | Yes | XXX |
| Fuel Transfer Canal to SFS Pump Suction Iso. Valve | SFS-PL-V040 | Yes | XXX |
| Cask Loading Pit to SFS Pump Suction Isolation Valve | SFS-PL-V041 | Yes | XXX |
| Cask Loading Pit to SFS Pump Suction Isolation Valve | SFS-PL-V042 | Yes | XXX |
| SFS Pump Discharge Line to Cask Loading Pit Isolation Valve | SFS-PL-V045 | Yes | XXX |
| Cask Loading Pit to WLS Isolation Valve | SFS-PL-V049 | Yes | XXX |
| Spent Fuel Pool to Cask Washdown Pit Isolation Valve | SFS-PL-V066 | Yes | XXX |
| Cask Washdown Pit Drain Isolation Valve | SFS-PL-V068 | Yes | XXX |
| Refueling Cavity Drain Line Check Valve | SFS-PL-V071 | Yes | XXX |
| Refueling Cavity Drain Line Check Valve | SFS-PL-V072 | Yes | XXX |
| SFS Containment Floodup Isolation Valve | SFS-PL-V075 | Yes | XXX |